

Mr. Michael Burke
Criterion Catalysts and Technologies, L.P.
1800 East US 12
Michigan City, IN 46360

Re: 091-14707
2nd Administrative Amendment to
Part 70 T-091-6789-00053

Dear Mr. Burke:

Criterion Catalysts and Technologies, L.P. was issued a permit on May 1, 2001 for an alumina powder and specialty chemical production plant. A letter requesting a change in the permit was received on August 1, 2001. Pursuant to the provisions of 2-7-11(a)(1) the permit is hereby administratively amended to "correct typographical errors" as follows (changes are bolded and deletions are struck-through for emphasis):

Source's Request 1:

Condition D.1.1 contains a table that lists several emission units for which process weight rate particulate limits are applicable, including the emission unit DCC. The DCC is not one of the emission units covered by Section 1, but is included in Section 3. Criterion assumes that the reference to DCC under Condition D.1.1 should be deleted.

OAQ Response 1:

The following table in Condition D.1.1 is revised to remove emission unit DCC:

Unit ID
P-SB1 (T-32)
P-SB2 (T-87)
P-SILOS*
S-DBE (EX-120-005A)
S-DBW (EX-120-005B)
P-SAR1 (T-33)
P-SAR2 (T-128)
P-ASR1 (T-30)
P-ASR2 (T-129)
P-BBL (E-160)
P-BL (E-190)

Unit ID
S-MIX (EX-120-007A/7B)
S-C1 (EX-300-25)
S-C2 (EX-130-005)
S-PT (EX-104)
ADC #1
P-SD (E-110)
S-D1 (EX-300-23)
DCG
SEACAP drier
SD-3

Source's Request 2:

Condition D.1.4 of the issued Part 70 references the need to perform visible emission notations on stack P-ARS1 (T-30). This stack should read P-ASR1 (T-30).

OAQ Response 2:

Conditions D.1.2 and D.1.4 are revised to fix the typographical error as follows:

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for P-SB1 (T-32), P-SB2 (T-87), P-SILOS, PSAR1 (T-33), P-SAR2 (T-128), P-~~ARS1~~ **ASR1**(T-30), P-ASR2 (T-129), P-BL (E-190), and P-SD (E110) their control devices.

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from the stacks PSAR1 (T-33), P-SAR2 (T-128), P-~~ARS1~~ **ASR1** (T-30), P-ASR2 (T-129), and P-SD (F-110) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Source's Request 3:

Condition D.1.5(b) requires the Permittee to do the following:

To document compliance with Condition D.1.5, the Permittee shall maintain the following:

- (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

The final version of the Title V permit does not contain a compliance requirement in Condition D.1.5 to perform differential static pressure readings, however Condition D.1.5 requires Record Keeping and Reporting for this parameter.

Condition D.1.5(c) requires documenting compliance with results of inspections required under Conditions D.1.6 and D.1.7, and the dates the vents are redirected. The final Title V permit does not contain Conditions D.1.6 and D.1.7.

OAQ Response 3:

Requirements D.1.5(b) and (c) were inadvertently included in the permit, and were deleted as follows:

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the stacks exhaust from the stacks mentioned in D.1.4 once per shift.

~~(b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:~~

~~(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:-~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle operation.~~

~~(2) Documentation of the dates vents are redirected.~~

~~(c) To document compliance with Conditions D.1.6 and D.1.7, the permittee shall maintain records of the results of the inspections required under Conditions D.1.6 and D.1.7 and the dates the vents are redirected.~~

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0
and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File -LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Criterion Catalysts and Technologies, L.P.
1800 East US 12
Michigan City, Indiana 46360-2074**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-6789-00053	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality <i>Original signed by Janet McCabe</i>	Issuance Date: May 1, 2001 Expiration Date: May 1, 2006
1 st Administrative Amendment No.: 091-14560, issued on July 26, 2001	
2 nd Administrative Amendment No.: 091-14707	Pages Affected: 30, 31, 32, 33
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: August 24, 2001

Facility Description [326 IAC 2-7-5(15)] (Continued):

- (l) Bag loadout, screener, and other particulate matter processes equipped with one (1) baghouse, identified as ADC #1 constructed in 1975, and exhausting to stack F.
- (m) One (1) natural gas dryer, identified as S-D1 (EX-300-23) constructed in 1965 and exhausting to stack P1.
- (n) One (1) natural gas fired high temperature drier, identified as SEACAP drier (EX-529), constructed in 1996 rated at 1.38 million British thermal units (MMBtu) per hour using a baghouse for particulate control, and exhausting to stack P3.
- (o) One (1) natural gas fired low temperature drier, identified as SD-3 (EX-300-35), constructed in 1965, rated at five (5) million British thermal units (MMBtu) per hour using no controls, and exhausting to stack P2.
- (p) One (1) natural gas fired spray dryer, identified as P-SD (E-110), constructed in 1956 and 1995, with a burner rated at 50 MMBtu/hr, a baghouse and cyclone integral to the process and a scrubber for particulate control, and exhausting to stack B.

Maximum capacities and throughputs for each unit have been included in an OAQ confidential file.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each of the facilities listed below shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Unit ID
P-SB1 (T-32)
P-SB2 (T-87)
P-SILOS*
S-DBE (EX-120-005A)
S-DBW (EX-120-005B)
P-SAR1 (T-33)

Unit ID
P-SAR2 (T-128)
P-ASR1 (T-30)
P-ASR2 (T-129)
P-BBL (E-160)
P-BL (E-190)
S-MIX (EX-120-007A/7B)
S-C1 (EX-300-25)
S-C2 (EX-130-005)
S-PT (EX-104)
ADC #1
P-SD (E-110)
S-D1 (EX-300-23)
SEACAP drier
SD-3

Emission limits for the units listed in this table are not documented because the process throughputs are considered confidential. These emission limits are included in an OAQ confidential file.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for P-SB1 (T-32), P-SB2 (T-87), P-SILOS, PSAR1 (T-33), P-SAR2 (T-128), P-ASR1 (T-30), P-ASR2 (T-129), P-BL (E-190), and P-SD (E110) their control devices.

Compliance Determination Requirements

D.1.3 Particulate Matter (PM)

- (a) In order to comply with D.1.1, each baghouse associated with a specific process shall be in operation and control emissions at all times that the specific process is in operation. The specific processes that are equipped with baghouses are:
- (1) One (1) storage bin identified as P-SB1 (T-32)
 - (2) One (1) storage bin identified as P-SB2(T-87)
 - (3) One (1) day bin identified as SDBE (EX-120-005A)
 - (4) One (1) day bin identified as S-DBW (EX-120-005B)
 - (5) One (1) bulk bag loading process identified as P-BBL with two baghouses (E-160, E-176)

- (6) One (1) bulk loading process containing one rail car loading system, identified as P-BL (E-190) and one sealand container loading system identified as P-BL (E-190)
- (7) Two (2) mixers identified as S-MIX (EX-120-007A and EX-120-007B)
- (8) Two (2) calciners identified as S-C1 (EX-300-25) and SC-2 (EX-130-005), equipped with one baghouse (EX-631-011).
- (9) One (1) pneumatic transfer process for the fines grinder system identified as S-PT (EX-104)
- (10) Bag loadout, screener, and other particulate matter processes identified as ADC #1
- (11) One (1) high temperature drier identified as SEACAP drier (EX-529)
- (b) In order to comply with D.1.1 the fabric filters for PM control shall be in operation and control the emissions from P-SILOS at all times that the silos are in operation.
- (c) In order to comply with D.1.1 the baghouse and cyclone integral to the spray dryer P-SD (E-110) shall be in operation and control emissions at all times the spray dryer is in operation. The scrubber controlling particulate matter from the spray dryer is not necessary to meet the allowable PM emission rate and does not have to be in operation at all times.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the exhaust from the stacks PSAR1 (T-33), P-SAR2 (T-128), P-ASR1 (T-30), P-ASR2 (T-129), and P-SD (F-110) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the stacks exhaust from the stacks mentioned in D.1.4 once per shift.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.